

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**
Roanoke Division

JOSHUA LEE SMITH,

Plaintiff,

v.

TWIN COUNTY REGIONAL HEALTHCARE,
MARIBEL RODRIGUEZ-MARTINEZ, M.D.,
LAURA B. LEONARD, R.N.,
CRYSTAL N. COLEMAN, R.N.,
TERESA L. WHITE, R.N.,
and TWO UNNAMED NURSES, A and B;

KARL R. HADE, EXECUTIVE SECRETARY OF
THE SUPREME COURT OF VIRGINIA, in his
official capacity,
HON. JEFFREY L. WRIGHT, in his official
capacity;

CARROLL COUNTY SHERIFF KEVIN A.
KEMP, in his official capacity, and DEPUTIES
KEITH A. MUSSER,
CHRISTOPHER R. MABRY,
ANTHONY G. HORTON, and TWO UNNAMED
DEPUTIES Y and Z,
in their individual and official capacities;

NEW RIVER VALLEY REGIONAL JAIL
AUTHORITY, and
MARY STEWART, JOLEN MABREY,
ROBERTA WEBB, DEREK TRENAR, NIKOLAS
MCGRADY, JUSTIN ARCHER, VERONICA
LOOP, DEREK TOLBERT, BRIAN COTTS,
MELISSA EDWARDS, JOHN MCNEELY,
ASHLEY UMBERGER, SHAUN BENZEL, and
BENJAMIN WATKINS, and THREE
UNNAMED JAIL OFFICERS 1, 2, and 3,
in their individual and official capacities;

DOE OFFICERS 4 and 5;

Case No. 7:22-cv-00238

and DOE individuals 6–10,)
)
Defendants.)

UNOPPOSED MOTION TO
EXTEND THE SERVICE PERIOD BY THIRTY DAYS

For the reasons set forth in the accompanying Memorandum of Law, Plaintiff hereby moves this Court, pursuant to Rules 4 and 6 of the Federal Rules of Civil Procedure, for a thirty-day extension of the time in which Plaintiff may serve any defendants who were working for, working in, or employed by the New River Valley Regional Jail or Twin County Regional Healthcare on or around May 3 or 4, 2020. A supporting Memorandum of Law and a Proposed Order accompany this Motion.

Dated: August 29, 2022

Respectfully submitted,

/s/Aderson Francois

Aderson Francois (D.C. Bar No. 498544)

(pro hac vice)

Lucia Goin (D.C. Bar. No. 1739389)

(pro hac vice)

Marissa K. Hatton (D.C. Bar No. 219291)

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/s/ Joshua Erlich

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2022, I filed a copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will provide copies to all counsel of record who have entered appearances. As all parties have not yet been served with process, service was not completed on all parties.

/s/ Lucia Goin
Counsel for Plaintiff